

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 1:16CR329-1
	)	
Plaintiff,	)	JUDGE SARA LIOI
	)	
v.	)	
	)	
EDWARD R. HILLS,	)	<u>MOTION FOR ORDER TO FILE</u>
	)	<u>UNDER SEAL</u>
Defendant.	)	

The Office of the United States Attorney requires an order permitting the filing of a document under seal due to a material change in the Defendant's economic circumstances. This notice is pursuant to statute.

"A restitution order shall provide that the defendant shall notify the court and the Attorney General of any material change in the defendant's economic circumstances that might affect the defendant's ability to pay restitution. *The court may also accept notification of a material change in the defendant's economic circumstances from the United States or from the victim.*" 18 U.S.C.A. § 3664 [emphasis supplied]

The information in question however, is in part, taken from the Defendant's Pre-Sentence Investigation Report, and should not be disclosed in a public filing. This request is pursuant to Local Rule 5.2 which requires the authority of a court order or statute to permit the filing of a document under seal. Based upon the foregoing, it is respectfully requested this motion be granted.

Respectfully submitted,

JUSTIN E. HERDMAN  
United States Attorney

By: /s/ Alex Rokakis  
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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of August 2019 a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Alex Rokakis

Alex Rokakis

Assistant U.S. Attorney